

Superfund/Oil Program Implementation Manual FY 02/03
Appendix A: Site Assessment/NPL Listing

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Appendix A

Site Assessment/NPL Listing Targets and Measures

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Appendix A
Site Assessment/NPL Listing
Targets and Measures

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APPENDIX A

A.A. Site Assessment/NPL Listing FY 02/03 TARGETS AND MEASURES

A.A.1 SITE ASSESSMENT PROGRAM AND NPL LISTING PRIORITIES

The site assessment annual performance goal for FY 2002 is 475 final site assessment decisions. Assessing the worst sites first continues as a national priority. The regions should identify the sites posing the highest risk or potential risk and develop a strategy to assess those sites in a timely manner, while balancing their other site assessment needs. While assessing the worst sites first, the regions also need to ensure that the backlog of sites needing Preliminary Assessments (PAs), Site Inspections (SIs), or Expanded Site Inspections (ESIs) does not grow unacceptably. The regions should consider integrating assessments to reduce cost and time to assess sites. Regions should continue the use of pre-CERCLIS screening to assure only appropriate sites are placed in CERCLIS/WasteLAN. The regions should also ensure the appropriate investigations of sites of Tribal concern that are on or near Indian Country.

To better accomplish the national priorities, the regions should continue negotiating work share agreements with individual States (and Tribes if applicable). This will help divide up the site assessment work and potentially enhance relations with the States and Tribes. This process will also serve to identify the current lead agency for the public.

Given sizeable workloads and constrained resources, regions are encouraged to fund special projects designed to reduce the time and/or costs of assessing sites without compromising the integrity of the site assessment decisions. Regions must obtain concurrence from OERR if more than 10 percent of annual site assessment funding is used for special projects. Regions performing special projects are responsible for communicating the scope of these projects to other EPA regional and headquarters (HQ) site assessment staff.

HQ and regions should continue the streamlined process for listing sites on the National Priority List (NPL) and evaluate alternatives to listing sites while providing NPL quality cleanups.

A.A.2 SITE ASSESSMENT BACKLOGS

A key function of HQ is to report national progress in the site assessment program. Workload estimates are critical indicators of future program needs. HQ captures these workload estimates by identifying the number of sites at various stages in the site assessment pipeline. These stages are commonly referred to as "backlogs". For example, sites needing completion of a CERCLA PA are collectively termed the "PA Backlog". Throughout this appendix, the procedures HQ uses to derive backlog is provided for each step in the site assessment process.

A.A.3 OVERVIEW OF FY 02/03 SITE ASSESSMENT/NPL LISTING TARGETS AND MEASURES

The Superfund Comprehensive Accomplishments Plan (SCAP) is used by the Assistant Administrator for the Office of Solid Waste and Emergency Response (AA OSWER), Assistant Administrator for the Office of Enforcement and Compliance Assurance (AA OECA), and senior Superfund managers to monitor the progress each region is making towards achieving the Government Performance and Results Act (GPRA) annual performance goals. In addition, SCAP will continue to be used as an internal management tool to project and track activities that contribute to these GPRA goals and support resource allocation. The program will set national goals based on historical performance and performance expectations within a limited budget for the performance goals in GPRA and track accomplishments in the activities contributing to those goals. Regions should continue to plan and report accomplishments in WasteLAN as they have traditionally.

To more clearly reflect the relationship between GPRA and the SCAP process, GPRA annual performance goals and measures and program targets and measures are defined as follows:

- **GPRA Annual Performance Goals (APG) and GPRA Annual Performance Measures (APM)** - The Agency's Annual Plan describes the specific annual performance goals, annual measures of outputs and outcomes, and activities aimed at achieving the performance goals that will be carried out during the year. APGs are the specific activities that the Agency plans to conduct during the fiscal year in an effort towards achieving its long-term strategic goals and objectives. APMs are used by managers to determine how well a program or activity is doing in achieving milestones that have been set for the year. The annual performance goals will inform Congress and Agency stakeholders of the expected level of achievement for the significant activities covered by the GPRA objective. The goals are a subset of the overall planning and budgeting information that has traditionally been tracked by the Superfund program offices.
- **Program Targets and Measures** are activities deemed essential to tracking overall program progress. Program targets are used to identify and track the number of actions that each region is expected to perform during the year and to evaluate program progress. Program measures are used to show progress made in achieving program priorities.

The following pages contain, in pipeline order, the definitions of the FY 02/03 Superfund site assessment/Brownfields targets and measures. Exhibit A.1 displays the full list of site assessment and Brownfields activities defined in this Appendix. Exhibit A.2, at the end of this Appendix, identifies the Subject Matter Experts (SMEs).

A.A.4 GPRA AND SITE ASSESSMENT

Goal 5, Objective 1, Subobjective 2 contains the GPRA subobjective for Superfund assessment work. This subobjective states:

"By 2005, EPA and its State, Tribal, and Federal partners will reduce the risks that Superfund sites pose to public health and the environment by....

...determining if Superfund cleanup is needed at 85% of the sites entered into the Superfund site data base (CERCLIS)...

...EPA will collaborate with States and Tribes to enhance the Federal, State, and Tribal Superfund program, reduce overlap among the programs, and leverage public and private resources to promote cost-effective, efficient cleanups of Superfund sites."

The assessment component of this subobjective focuses on the percent of sites brought to the attention of the Superfund program where Final Assessment Decisions (FADs) have been made. The formula to derive this measure is:

$$\frac{\text{No. sites with a final assessment decision}}{\text{Total sites in the CERCLIS and Archive site inventories}}$$

EPA Regions are responsible for maintaining FAD designations in WasteLAN. FAD status is captured in WasteLAN by selecting "Yes" in the "Final Assessment Decision" field on the Site Description/Operable Units screen. The WasteLAN application system populates the related "Final Assessment Decision Date:" field with the current date. Regions can accept or edit this date. The percentage of sites with FADS and the number of current fiscal year and cumulative FAD designations is captured on the GPRA SCAP-15 report available through WasteLAN.

Regions may assign a FAD designation to a site if any of the following conditions are met:

- The site has been proposed to or placed on the National Priorities List (NPL);
- The site has been removed from proposal to the NPL and no further assessment is needed;
- The decision made at the last completed assessment at the site is either:
 - No further remedial action planned (NFRAP);
 - Referred to Removal-NFRAP
 - Deferred to RCRA or NRC; or
 - Addressed as part of an NPL or non-NPL site;
- The site is being remediated under a formal state deferral agreement;
- The site is being remediated as a Superfund Alternative Site;
- The site is being remediated under a State, **Local**, Tribal, or other Federal **government** cleanup program **as supported by written documentation between the lead party and EPA (e.g., Voluntary Cleanup Program Memorandum of Agreement or other work sharing type of agreement, site specific reports or fact sheets submitted by the lead party, etc.), and the site file contains documentation** supporting the decision that Superfund assessment work is complete;
- The site has been properly archived from the active CERCLIS site inventory.

Regions must delete the FADs designation should conditions change such that the site no longer meets any of the above conditions.

EXHIBIT A.1 SITE ASSESSMENT/NPL LISTING ACTIVITIES

ACTIVITY	GPRA		PROGRAM	
	APG	APM	TARGET	MEASURE
Targeted Brownfields Assessment				✓
Pre-CERCLIS Screening Assessment				✓
Non-NPL Site Status				✓
Site Discovery				✓
Sites Archived				✓
Preliminary Assessment (PA) at Non-Federal Facility Sites				✓
Federal Facility PA Review				✓

EXHIBIT A.1
SITE ASSESSMENT/NPL LISTING ACTIVITIES

ACTIVITY	GPRA		PROGRAM	
	APG	APM	TARGET	MEASURE
Site Inspection (SI) at Non-Federal Facility Sites				✓
Federal Facility SI Review				✓
Combined PA/SI Assessment at Non-Federal Facilities				✓
Site Inspection Prioritization (SIP) at Non-Federal Facility Sites				✓
Site Reassessment				✓
Expanded Site Inspection (ESI) at Non-Federal Facility Sites				✓
Federal Facility ESI Review				✓
Integrated ESI/RI at Non-Federal Facility Sites				✓
State Deferral of Non-Federal Facility Sites				✓
Hazard Ranking System (HRS) Package (Non-Federal Facility and Federal Facility)				✓
Integrated Removal Assessment & PA at Non-Federal Facility Sites				✓
Integrated Removal Assessment & SI at Non-Federal Facility Sites				✓
Integrated Removal Assessment & Combined PA/SI at Non-Federal Facility Sites				✓
Integrated Removal Assessments and Expanded Site Inspection (ESI)				✓
Integrated Removal Assessments and Site Inspection Prioritizations (SIPs)				✓
Integrated Removal Assessments and Hazard Ranking System (HRS)				✓
Integrated Removal Assessments and Expanded Site Inspection and Remedial Investigation (ESI/RI)				✓
NPL Listing	✓			
<i>No. of Final Assessment Decisions *</i>	✓			

NOTE:

Accomplishments are pulled from WasteLAN on a semi-annual basis.

* *Italic* text indicates that this activity is a goal or measure that is not specifically defined in the Appendices to the Manual. Data to support reporting of this goals are already included in existing definitions.

A.A.5 SITE ASSESSMENT/NPL LISTING DEFINITIONS

a. TARGETED BROWNFIELDS ASSESSMENT

Definition:

“EPA’s Targeted Brownfield’s Assessment (TBA) program is designed to help States, Tribes, and local governments - especially those without EPA Brownfields Assessment Demonstration pilots - minimize the uncertainties of contamination often associated with brownfields. EPA generally will not fund TBAs at sites where the owner could be responsible for the contamination on the site unless there is a clear means of recovering EPA expenditures and there is significant public benefit. Due to the passage of the new Brownfields law (Public Law 107-118) and the new 03 funding structure, EPA will have authority under CERCLA 104(k)(2) (A)(ii) to perform Federal-administered TBA's via contract with funding from one of the earmarks in the STAG appropriation. The Agency can also fund states and tribes to perform State or Tribal-administered TBA's under CERCLA 128(a) with STAG appropriations from the other STAG earmark, if the States and tribes choose to use their CERCLA 128(a) grant for that purpose.

Under the TBA program, EPA provides funding and/or technical assistance for environmental assessments at brownfields sites throughout the country. A TBA may encompass one or more of the following activities:

- A screening (ASTM Phase I* or equivalent) assessment, including a background and historical investigation and a preliminary site inspection;
- A full (ASTM Phase II* or equivalent) site assessment, including sampling activities to identify the types and concentrations of contaminants and the areas of contamination to be cleaned; and
- Establishment of cleanup options and cost estimates based on future uses and redevelopment plans.”

(Source: “Targeted Brownfields Assessments” Quick Reference Fact Sheet (EPA 500-F-98-251, November 1998) available on the EPA Internet at <http://www.epa.gov/swerosps/bf/html-doc/tba.htm>

*ASTM (American Society for Testing and Materials) Standards:

E1527-00 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process

E1903-97 Standard Guide for Environmental Site Assessments: Phase II Environmental Site Assessment Process)

Additional ASTM information available at: www.astm.org.

Definition of Accomplishment:

Regions can get accomplishment credit both “Targeted Brownfields Assessments” and “Number of Brownfields Properties Addressed by TBAs.” A Brownfields Properties Addressed by TBAs is only counted once when the first TBA is completed at the property.

To get credit for TBA accomplishments, the Regions are required to enter and reconcile the data in WasteLAN in two different modules: in the Accomplishments Tracking Screens and in the Brownfields Module. (Dual module entry is required because the definition of properties assessed requires property-specific information on all historical TBAs (conducted since 1987) and many Regions have not yet entered this historical information. This requirement will be reviewed when all the Regions input their historic data).

Reporting TBAs and Properties on a Non-Property Specific Basis in the Accomplishments Tracking Screens.

Regions can get accomplishment credit for completed quarterly accomplishment information for both “Targeted Brownfields Assessments” and “Number of Brownfields Properties Addressed by TBAs” through the Non-site Accomplishments Screens.

Reporting TBAs and Properties on a Property Specific Basis in the Brownfields Module.

The WasteLAN Brownfields module provides the Regions with a centralized database for directly entering and tracking Targeted Brownfields Assessments (TBAs) information on a property-specific basis. Currently, the WasteLAN Brownfields module allows Regions to enter and track the following information about TBAs and the properties addressed by TBAs.

A TBA is complete when a particular site characterization activity undertaken has concluded (an Actual Completion Date exists for the Targeted Brownfields Assessment action 'ON'). The TBA must be identified as either Phase I, Phase II, or Cleanup Opt/Cost Est. using the Indicator field on the SCAP Information screen in WasteLAN.

Credit for a property assessed by a TBA is given for the first TBA which is performed at a specific Brownfields Property (rat_code = ON and Actual Completion Date exists and is "first-at-site").

Changes in Definition FY 01 - FY 02/03:

Due to the passage of the new Brownfields law (Public Law 107-118) and the new 03 funding structure, EPA will have authority under CERCLA 104(k)(2) (A)(ii) to perform Federal-administered TBA's via contract with funding from one of the earmarks in the STAG appropriation. The Agency can also fund states and tribes to perform State or Tribal-administered TBA's under CERCLA 128(a) with STAG appropriations from the other STAG earmark, if the States and tribes choose to use their CERCLA 128(a) grant for that purpose. Designating the TBA lead as Federal or State is required and will indicate the source of the TBA funding.

Special Planning/Reporting Requirements:

Entering Data on TBAs and Properties on a Non-Property Specific Basis in the Accomplishments Tracking Screens.

TBA information is tracked in WasteLAN on a non-property specific basis, using the system's Accomplishments Tracking screens. You must enter quarterly planning data prior to entering completed quarterly accomplishment information for "Targeted Brownfields Assessments" and "Number of Brownfields Properties Addressed by TBAs." Annual planning data should be entered in October of each fiscal year. It may be updated at any time.

Detailed data entry instructions for Non-Property information can be found in Quick Reference Guide entitled "Tracking Brownfields Assessments." This document is available on EPA's Intranet at http://intranet.epa.gov/swerbrnf/pdf/bfa_qrg.pdf

Entering Data on TBAs and Properties on a Property Specific Basis in the Brownfields Module.

A Brownfields module was designed and incorporated into WasteLAN during fiscal year 1999. The WasteLAN Brownfields module provides the Regions with a centralized database for directly entering and tracking Targeted Brownfields Assessments (TBAs) information on a property-specific basis. Currently, the WasteLAN Brownfields module allows Regions to enter and track information about TBAs and the properties addressed by TBAs.

EPA has developed several guidance documents that provide directions for entering property-specific TBA information in WasteLAN.

These documents are available on EPA's Intranet Web site (http://intranet.epa.gov/swerbrnf/wl_bfmod.htm).

Reconciling TBA Data on a Property Specific and Non-Property Specific Basis

Each Region is expected to reconcile the Property Specific Numbers and Non-Property Specific Numbers using the SCAP-13 Brownfields Report. The report shows official accomplishments of Targeted Brownfields Assessments (TBAs) completed and the Number of Properties Addressed by TBAs in the columns on the left of the report from the Accomplishments Tracking module of WasteLAN, without property-specific detail. For comparison, the columns on the right of the SCAP-13 Brownfields Report shows the TBAs and Properties that have property-specific details from the Brownfields Module. These two sets of numbers should be closely comparable. The number of "Targeted Brownfields Assessments" in both modules should always be the same. Because Properties Addressed are only counted once, the properties will only match, if all historical TBA's are entered. Otherwise, a manual count of the Properties Addressed must be entered in the Accomplishment Screens, which counts the properties once in the first quarter and year that they are assessed.

b. PRE-CERCLIS SCREENING ASSESSMENTS

Definition:

Pre-CERCLIS screening is the process of reviewing data on a potential site to determine whether it should be entered into the CERCLIS inventory for further evaluation. The process can be initiated through the use of several mechanisms, such as a phone call or referral by a State or other Federal agency. The information/collection process is normally limited to one or two days. A site should not be entered into CERCLIS if:

- It is currently in CERCLIS or has been removed from CERCLIS and no new data warrants re-entry into CERCLIS;
- The site or contaminants found on the site are subject to certain limitations based on definitions in CERCLA;
- A State or Tribal remediation program is involved in response at the site and it is in the process of a final cleanup;
- The hazardous substance release at the site is regulated under a statutory exclusion (e.g., petroleum, natural gas, natural gas liquids, synthetic gas usable for fuel, normal application of fertilizer, release located in a workplace, naturally occurring, or covered by the Nuclear Regulatory Commission (NRC), or Uranium Mill Tailings Radiation Control Act (UMTRCA), [see CERCLA section 101(22)];
- The hazardous substance release at the site is deferred by policy considerations (e.g., RCRA Corrective Action);
- Site data are insufficient to determine if CERCLIS entry is warranted (i.e., based on potentially unreliable sources or with no information to support the presence of hazardous substances or CERCLA eligible pollutants or contaminants);
or
- Documentation clearly demonstrates that there is no potential for a release that could cause adverse environmental or human health impacts.

For more information on pre-CERCLIS screening please refer to Pre-CERCLIS Screening Assessments fact sheet (OSWER 9375.2-11FS). This fact sheet provides the minimum requirements for conducting these type of assessments.

Definition of Accomplishment:

Pre-Screening Starts - A pre-screening (Action Name = Pre-CERCLIS Screening) is started when the region begins collecting data and performing other tasks related to completion of the Pre-CERCLIS Screening Assessment Checklist; and WasteLAN contains the actual pre-screening start date (Actual Start) and an action lead of: "Fund-Financed (F)"; "EPA-In House (EP)." Pre-CERCLIS screening start dates are not required.

Pre-Screening Completions - A pre-screening (Action Name = Pre-CERCLIS Screening) is completed when:

- A Pre-CERCLIS Screening Assessment Checklist has been developed by EPA to document the decision and placed in the site file. The Pre-CERCLIS Screening actual completion date is the date the Checklist is finalized; and

- WasteLAN contains the actual Pre-CERCLIS Screening completion date (Actual Complete), a valid lead (Lead), and appropriate values in the NPL and Non-NPL Status fields.

In addition to the pre-screening action, entry of the following information is required:

Sites that require NPL assessment work, or both NPL assessment and removal work

- A Discovery Date on the Add Site screen, which corresponds to the actual completion date of the pre-screening action;
- An NPL Status of 'Not on the NPL' on the Add Site screen;
- A Non-NPL Status of 'PA Start Needed', 'Combined PA/SI Start Needed', or 'Integrated Removal Assessment PA Start Needed' on the Site Description/Operable Unit screen.

Sites that require only removal work

- An Initiation Date on the Add Site screen, which corresponds to the actual completion date of the pre-screening action;
- An NPL Status of 'Not on the NPL' on the Add Site screen;
- A Non-NPL Status of 'Removal Only' on the Site Description/Operable Unit screen.

Sites that require no further evaluation beyond the pre-screening

- An NPL Status of 'Not a Valid Site or Incident' on the Add Site screen;
- A Non-NPL Status of 'Not a Valid Site or Incident', 'Not a Valid Site - RCRA Lead', 'Not a Valid Site - NRC Lead', 'Not a Valid Site - State Lead', or 'Not a Valid Site - Tribal Lead.'

For more information on tracking Pre-CERCLIS Screening activities, please refer to the March 2002 guidance document entitled "Data Entry for Pre-Screening Sites."

Changes in Definition FY 01 - FY 02/03:

Pre-screening activities are now being tracked site-specifically.

Special Planning/Reporting Requirements:

All pre-CERCLIS screening activities should be tracked in WasteLAN, including activities at sites not found to be CERCLA-eligible. Sites that are screened out of CERCLIS will be tracked in WasteLAN through the "Not a Valid Site or Incident" values in the NPL and Non-NPL status field. If the decision is made that the site requires NPL assessment and potential cleanup under CERCLA authority, it should be added to the CERCLIS inventory by entering a Discovery Date and valid NPL and Non-NPL Statuses. A Discovery action or date should not be entered into WasteLAN if the site only needs a removal assessment/action and no NPL assessment work is necessary. For these sites with "removal-only" interest, the Site Initiation Date on the Add Site screen needs to be entered for these sites to be considered part of the CERCLIS inventory. Sites that are screened out of the CERCLIS inventory should be entered on the Add Site screen with no Discovery or Initiation date, and the NPL status 'Not a Valid Site or Incident'. The region will maintain a record based on a pre-screening action. This is a program measure.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into WasteLAN, the system automatically calculates a new value for this field based on the traditional sequence of site assessment work. Regions must confirm or change this value as appropriate.

c. NON-NPL STATUS

Definition:

Non-NPL Status is the status assigned to a non-NPL site as it moves through the site assessment/removal pipeline. It is used to determine current regional and national assessment workloads (i.e., “backlogs”) and for reporting Superfund progress at non-NPL sites.

Definition of Accomplishment:

This measure tracks the progress EPA and its State and Tribal partners are making in addressing non-NPL sites under the Federal Superfund program. As site assessment and removal start and complete dates are entered into WasteLAN for non-NPL sites, the system automatically assigns a new Non-NPL Status value and a message is displayed stating the new value. Regions can change this value via the Site Description/Operable Units screen.

All non-NPL sites in both the CERCLIS and Archive site inventories must be assigned a valid Non-NPL status value. When the user selects or changes the Non-NPL Status, the system generates the date of the change in the Non-NPL Status Date field. Users may edit this date. For further details, including valid values, please refer to two January 2002 factsheets, *Reporting Non-NPL Status Quick Reference Guide* and *Understanding NPL and Non-NPL Status Code Relationships*. Both of these documents are available on the CERCLIS 3 Document database under Training and Documentation Section in the Quick Reference Guide folder.

Changes in Definition FY 01 - FY 02/03:

None.

Special Planning/Reporting Requirements:

EPA will utilize the Non-NPL Status field for site inventory management and reporting site assessment backlogs and progress.

The progress of each non-NPL site, as it moves through the site assessment/removal pipeline is tracked in WasteLAN. The “Non-NPL Status” field, located on the Site Description/Operable Unit screen, contains this information. Regions are responsible for maintaining the accuracy of this field for every non-NPL site in the CERCLIS and Archive site inventories. As new actions and dates are entered and saved in WasteLAN, the system automatically generates a new value for this field. The generated value is based on the traditional sequence of site assessment work. Regions can change this value via the Site Description/Operable Units screen.

A user can edit the system-generated non-NPL Status value by going to the Site Description/Operable Unit screen and selecting a new value from the drop down list. Regions may want to do this if a different non-NPL Status value more closely reflects the actual status of a site. For example, the system may generate an “HRS Start Needed” non-NPL Status value after completion of a Site Inspection action is recorded in WasteLAN. Site specific information may show that an “Other Cleanup Activity: State-Lead Cleanup” value is more accurate. The list of values available in the Non-NPL Status drop down will depend upon the NPL status of each site, in order to prevent conflicting values from being entered in the two fields. Please refer to the January 2002 Quick Reference Guide *Understanding NPL and Non-NPL Status Code Relationships* for a list of valid combinations.

Users can protect the non-NPL Status value from being changed as new data are entered. To do this, the user must click on the “Protect Status” check box. As long as this box is checked, the non-NPL Status value will not change even if the site assessment/removal data on the Site Schedule are updated. However, the system will notify users in these cases that another non-NPL Status value may be more appropriate based on traditional pipeline select logic. Users may decide to deselect the “Protect Status” check box, thereby allowing WasteLAN to automatically generate the system-proposed value in this field. The Non-NPL Status value is only required for sites with an NPL Status of ‘Not on the NPL’ or ‘Not a Valid Site or Incident.’ However a limited number of Non-NPL Status options are available for these sites.

d. SITE DISCOVERY

Definition:

Site discovery is the process by which a potential hazardous waste site is entered into the CERCLIS inventory for NPL assessment activities. All sites moving through the NPL assessment process must have a Discovery action and actual completion date documented in WasteLAN. Entry of the site discovery date initiates the NPL assessment process and places the site on the Preliminary Assessment backlog.

Definition of Accomplishment:

Site discovery of non-Federal facilities is the date the region completes the pre-CERCLIS screening activities, and documents the decision that the site warrants Superfund NPL assessment and potential cleanup attention. The site discovery date for Federal facilities is the date the site is formally added to the Federal Facilities Hazardous Waste Compliance Docket indicating Superfund involvement is required. The Site Name and Discovery Date must be entered into WasteLAN for both Federal and non-Federal sites. Valid leads for site discovery actions include: "Fund-Financed (F)"; "EPA-In House (EP)"; "State (S)"; "Tribal (TR)"; and "Federal Facility (FF)."

Changes in Definition 01 - FY 02/03:

None.

Special Planning/Reporting Requirements:

Actual start and planning dates are not required for the Discovery action. The Discovery date is entered through the Add Site screen. The Discovery date will automatically populate the actual completion date for the Discovery action. Regions are now required to enter information on site type at the time of discovery on the Add Site or Site Discovery/Initiation screen. Multiple discovery actions are not allowed. Site discovery is a program measure.

Note: A separate field has been added to WasteLAN to record site initiation dates for removal-only sites. Sites that are subject only to removal interest generally do not require a discovery date. An exception is where a large scale removal action has been completed and the region seeks credit for a non-NPL site completion. Non-NPL site completions require site assessment review indicating the site has no further remedial actions planned. The discovery date for sites referred from removal to assessment should be the date the referral decision is made.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into WasteLAN, the system automatically calculates a new value for this field based on the traditional sequence of site assessment work. Regions must confirm or change this value as appropriate.

e. SITES ARCHIVED

Definition:

Archiving represents a site-wide decision that no further interest exists at the site under the Federal Superfund program based on available information. It is a comprehensive decision **indicating** there **is** no further **Superfund** site assessment, remedial, removal, enforcement, cost recovery, or oversight activities being planned or conducted at the site. **Regions may perform re-evaluation work at a site while it is archived if site conditions change and/or new information becomes available. Sites re-evaluated and determined to need substantial site characterization and/or cleanup work under the Federal Superfund program must be returned to the CERCLIS inventory. Regions may also record general enforcement related activities (e.g. issuance of comfort letter or prospective purchaser agreements) and Brownfields activities (e.g. Targeted Brownfields Assessments) at archived sites.**

Backlogs

The Archive site backlog consists of the potential archive candidate sites described below.

Definition of Accomplishment:

An archive decision is recorded in WasteLAN at the site level. To receive credit for an archive decision, the Archive Indicator (Archive IND) must be checked, and the "Archive Date" entered on the Site Description/Operable Units screen. A note must be prepared and placed in the site file explaining that no further Federal Superfund interest exists at the site based on available information. *Since archiving is a comprehensive decision, the note must represent the interests of the appropriate regional business units (e.g., site assessment, removal, etc.), including the regional RCRA program for archive designations based on site deferral to RCRA. Regions should also consult with State and/or Tribal partners prior to making an archive designation to ensure any issues related to archiving are considered and handled appropriately.* The date of the note is the Archive Date and entering this date automatically generates the Archive Indicator in WasteLAN.

Although the underlying basis for archiving a CERCLIS site is whether or not Federal Superfund interest exists, several categories of sites are used to generate lists of potential archive candidate sites. Based on review of sites in these categories, regions should update the "Archive IND" and "Archive Date" field as appropriate in a timely fashion. These categories are:

- Sites that have only completed the site assessment process and have either been given a No Further Remedial Action Planned (NFRAP) or Deferred decision at the conclusion of the last completed site assessment *action*, and no other Federal Superfund activity is anticipated;
- Sites that have completed both the removal and site assessment process, or have completed the removal process and require no site assessment work (removal-only sites), and which have completed all related oversight, cost recovery/other enforcement work, and have no further Federal Superfund activity anticipated;
- Sites that have successfully completed State Deferral as described in the May, 1995 OSWER Directive 9375.6-11 titled "Guidance on Deferral of NPL Listing Determinations While States Oversee Response Actions" and no further Federal Superfund activity is anticipated;
- Sites removed from the proposed NPL or final NPL (e.g., as a result of a lawsuit) that have no further Federal Superfund activity anticipated;
- *Child sites addressed as part of a parent NPL or non-NPL site, provided there is no further Federal Superfund interest at the area represented by the child site. Parent non-NPL sites should not be archived until all related child sites have been archived;*
- Sites that have been entered into the CERCLIS inventory via entry of a site discovery and/or site initiation date which have not had any work started and, based on review, do not warrant any type of additional Superfund activity. An abbreviated preliminary assessment (PA) should be completed for these sites prior to designating archive status.

As appropriate, sites can be returned to the CERCLIS inventory by deleting the date in the Archive Date field. The Archive Indicator will automatically be deleted. A note explaining why the site was returned to the CERCLIS inventory must be prepared and placed in the site file.

Changes in Definition FY 01 - FY 02/03:

Clarified certain actions can be recorded at sites while they are archived. Added reminder that the note to the site file must represent the interests of all relevant Superfund business units given the comprehensive nature of the archive designation. Added reminder to consult with State/Tribal partners on archive decisions. Added child sites as eligible candidates for archiving (with conditions). Removed Deleted NPL sites as eligible candidates for archiving.

Special Planning/Reporting Requirements:

The Archive Indicator field in WasteLAN is used as a filter on Superfund reports and data sets to delineate whether a site is still in, or has been removed from, the CERCLIS inventory. Planning dates for archiving sites are not available. It is important to note that an archive decision is not the same as no further remedial action planned (NFRAP) decision. A NFRAP decision is recorded as an Action Qualifier, is made only at the conclusion of a site assessment action, and does not take into account any other Superfund programmatic activity that may be going on at a site such as removals or cost recovery. Archived sites is a program measure for both non-Federal and Federal facilities.

The WasteLAN application will prevent adding certain assessment, removal, remedial, and enforcement actions at archived sites. The CERCLIS-Archive Quick Reference Guide lists the prohibited actions. Prohibited actions can be added to a site by either: 1) returning the site to CERCLIS (e.g., substantial site characterization and/or cleanup is needed); or 2) requesting a database revision through Headquarters (e.g., entry of historical data). The restriction will not prevent users from entering action-related data such as start/completion dates, leads, qualifiers, etc., at existing actions. WasteLAN will also prevent the archival of NPL sites (Proposed, Final, and Deleted) and sites having a start and no completion date at an archive-prohibited action.

Archive designations need to be made in a timely fashion to accurately portray the status of sites to all users of Superfund Program information. The site assessment program area within WasteLAN's reports module contains reports to help EPA regions maintain the integrity of archive data. The Potential Archive Site Inventory Report lists sites that may be eligible for archival. The Archived-To-Be-Reviewed Site Inventory Report lists sites that may warrant data corrections/updates or return to the active CERCLIS site inventory.

The WasteLAN application now captures archive designations by automatically generating an archive action and completion date when the Archive Date field is populated.

f. PRELIMINARY ASSESSMENTS (PA) AT NON-FEDERAL FACILITY SITES

Definition:

A Preliminary Assessment (Action Name = Preliminary Assessment) is often the first phase of the NPL assessment process following site discovery. The PA is used to determine what steps, if any, need to occur next at the site. Federal, State, and local government files, geological and hydrological data, and data concerning site practices are reviewed to complete the PA report. An on- or off-site reconnaissance also may be conducted, although it is not required.

Regions may combine PA and SI activities where warranted by site conditions to reduce repetitive tasks and ultimately costs. The combining of PA and SI activities is known as a "Combined PA/SI Assessment" and is discussed in a separate measure below. The decision to perform a "Combined PA/SI Assessment" is made when site assessment activities are initiated.

Regions also have been encouraged to further reduce repetitive tasks and costs by combining site assessment and removal evaluation activities where warranted by site conditions. This integrated removal/remedial evaluation is further discussed in a separate measure, below.

There are instances when an Abbreviated Preliminary Assessment (APA), as opposed to a full PA, is warranted. Examples include, but are not limited to the following: 1) A site has been inappropriately listed in CERCLIS because it is either not eligible or it could be deferred to another response program; 2) Available information allows EPA to make an early decision to undertake a combined PA/SI, an SI, or another Superfund investigation; or 3) A no further remedial action planned (NFRAP) designation can be made without completing a full PA. An abbreviated PA should be conducted for sites entered into the CERCLIS inventory via a site discovery at which no work has started and, based on review, do not warrant any type of additional Superfund activity. For such sites, the typical PA reporting requirements are abbreviated. The APA Checklist or an APA report must address the requirements set forth in the Oil and Hazardous Substances National Contingency Plan (NCP).

For more information on Abbreviated Preliminary Assessments please refer to Abbreviated Preliminary Assessment fact sheet (OSWER 9375.2-09FS) This fact sheet provides the minimum requirements for conducting this type of assessment.

Backlogs

The Preliminary Assessment backlog consists of sites with a Non-NPL Status of either "PA start needed" or "PA ongoing".

Definition of Accomplishment:

PA Starts - A PA (Action Name = Preliminary Assessment) is started when the region begins collecting data and performing other tasks related to development of the PA report; or when the region signs a letter, form, memo, or issues a Technical Direction Document (TDD) to the EPA contractor or State/Tribal government (where applicable), requesting performance of a PA at a specific site or group of sites; or when EPA receives written confirmation from a State/Tribal government that the State/Tribal government will conduct the PA; and WasteLAN contains the actual PA start date (Actual Start) and an action lead of: "Fund-Financed (F)"; "EPA-In House (EP)"; "State (S)"; or "Tribal (TR)". PA start dates are required and are used by HQ as a program measure.

APA Starts - An Abbreviated PA is started when the region begins collecting data and performing other tasks related to development of the PA report; or when the region signs a letter, form, memo, or issues a Technical Direction Document (TDD) to the EPA contractor or State/Tribal government (where applicable), requesting performance of a PA at a specific site or group of sites; or when EPA receives written confirmation from a State/Tribal government that the State/Tribal government will conduct the PA.

PA Completions - A Preliminary Assessment (Action Name = Preliminary Assessment) is completed when:

- A PA Report has been developed by EPA; or received by the region from the Federal contractor or State/Tribal government; and the appropriate Regional official signs a letter, form, or memo approving the PA report. The PA actual completion date is the date the PA report is approved; and
- WasteLAN contains the actual PA completion date (Actual Complete), a valid lead (Lead), and a "decision" on whether further activities are necessary in the Qualifier field; and
- The decision is documented by completing the Site Decision Form 9100-3 in WasteLAN or an equivalent document. The decision document must be printed, signed by the appropriate Regional official, and placed in the file.

Valid decisions to be recorded in WasteLAN upon completion of the PA include:

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(H) High - Higher priority for further assessment Note: The next stage of assessment would typically be an SI (Action Name = Site Inspection); or

(L) Low - Lower priority for further assessment; or

(N) - No further *remedial* action planned; or

(D) - Deferred to RCRA (Subtitle C); or

(DN) - Deferred to NRC; or

(A) - Site is being addressed as part of a NPL site. The site should also have an NPL Status Indicator (Site NPL Status) of 'A' and a valid value in the Parent Site ID field; or

(B) - Site is being addressed as part of another non-NPL site. The site should also have a Non-NPL Status of 'Addressed as part of another non-NPL site' (AX) and a valid value in the Parent Site ID field; or

(F) - Referred to the removal program with further remedial assessment needed; or

(W) - Referred to the removal program with *no* further remedial assessment needed.

APA Completions - An Abbreviated Preliminary Assessment is completed when an APA checklist or equivalent report has been completed by EPA; or received by the region from the Federal contractor or State/Tribal government; and the appropriate Regional official signs a letter, form, or memo approving the APA report. The APA actual completion date is the date the APA report is approved.

Changes in Definition FY 01 - FY 02/03:

Added qualifier "Site is being addressed as part of another non-NPL site."

Special Planning/Reporting Requirements:

Regions should attempt to complete PAs at non-Federal Facility sites listed in WasteLAN within one year of the site discovery completion date.

If a region decides to perform an Abbreviated Preliminary Assessment (APA) rather than a Preliminary Assessment, it needs to be indicated on the SCAP Information screen. Once an APA is selected on the SCAP Information screen, the definition, documentation, and special notes changes will be reflected on the screen. PA starts and completions (Actual Start and Complete) are reported site-specifically in WasteLAN. Preliminary Assessment completions at non-Federal Facility sites is a program measure.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into WasteLAN, the system automatically calculates a new value for this field based on the traditional sequence of site assessment work. Regions must confirm or change this value as appropriate.

g. FEDERAL FACILITY PRELIMINARY ASSESSMENT REVIEWS**Definition:**

Federal Facility Preliminary Assessment Review is a quality assurance review of a PA report submitted by another Federal Agency. EPA's involvement in PAs at Federal facilities differs from that at non-Federal facilities. While EPA conducts or funds development of PAs at non-Federal facilities, EPA's role at Federal facilities is limited to reviewing PA reports developed and submitted by the Federal agencies responsible for a given Federal facility. Upon reviewing the PA for completeness, and working with the other Federal agency to address any deficiencies, EPA then determines what next steps are appropriate with respect to NPL listing.

Backlogs

The Federal Facility PA Review backlog consists of Federal facility sites with a Non-NPL Status of "FF-PA review needed" or "FF-PA review ongoing."

Definition of Accomplishment:

Federal Facility PA Review Starts - A Federal Facility PA Review (Action Name = Federal Facility Preliminary Assessment Review) is started when the EPA starts an in-house review of the Federal facility PA or sends a letter, form, or memo to the EPA contractor requesting review of the Federal facility PA report, and WasteLAN contains the actual PA start date (Actual Start) and a valid action lead of "Fund-Financed (F)"; "EPA-In House (EP)"; "State (S)"; or "Tribal (TR)".

Federal Facility PA Review Completions - A Federal Facility PA Review (Action Name = Federal Facility Preliminary Assessment Review) is completed when:

- The appropriate Regional official signs a letter, form, or memo approving the PA report. The Federal Facility Preliminary Assessment Review actual completion date is the date the Federal facility PA report is approved;
- WasteLAN contains the actual Federal Facility Preliminary Assessment Review completion date (Actual Complete) a lead and a "decision" on whether further activities are necessary in the Qualifier field; and
- The decision is documented by completing the Site Decision Form 9100-3 in WasteLAN or an equivalent document. The decision document must be printed, signed by the appropriate Regional official, and placed in the file.

Valid decisions to be recorded in WasteLAN upon completion of a Federal facility PA Review include:

(H) - High - Higher priority for further assessment Note: The next stage of assessment would typically be an SI (Action Name = Site Inspection); or

(L) - Low - Lower priority for further assessment; or

(N) - No further *remedial* action planned; or

(A) - Site is being addressed as part of a NPL site. The site should also have an NPL Status Indicator (Site NPL Status) of 'A' and a valid value in the Parent Site ID field; or

(B) - Site is being addressed as part of another non-NPL site. The site should also have a Non-NPL Status of 'Addressed as part of another non-NPL site' (B) and a valid value in the Parent Site ID field; or

(D) - Deferred to RCRA (Subtitle C); or

(DN) - Deferred to NRC.

Changes in Definition FY 01 - FY 02/03:

Added qualifier "Site is being addressed as part of another non-NPL site."

Special Planning/Reporting Requirements:

Regions should attempt to complete PA reviews at Federal facility sites listed in the CERCLIS inventory within 18 months of the site discovery completion date. Federal facility PA review starts and completions are reported site-specifically in WasteLAN. Federal Facility Preliminary Assessment Review starts and completions are program measures.

If the Federal facility PA report does not provide sufficient information to make a NPL assessment decision, the report should be referred back to the Federal facility (SubAction Name = Referred back to Fed Fac). The date the report is referred back to the Federal facility is entered into WasteLAN as the actual completion date (Actual Complete). The actual completion date and qualifier for the Federal Facility Preliminary Assessment Review should not be entered until all the report deficiencies have been addressed.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into WasteLAN, the system automatically calculates a new value for this field based on the traditional sequence of site assessment work. Regions must confirm or change this value as appropriate.

h. SITE INSPECTIONS (SI) AT NON-FEDERAL FACILITY SITES

Definition:

The SI (Action Name = Site Inspection) involves the collection of field data from a suspected hazardous waste site to confirm or deny the presence of contamination and to further characterize contaminants, migration pathways, and background contaminant levels. The SI serves as a further screening activity to determine what steps, if any, need to occur next at the site. Regions should employ Field Analytical Sampling (FAS) techniques wherever practical during conduct of SI activities.

Regions may combine PA and SI activities where warranted by site conditions to reduce repetitive tasks and, ultimately costs. The combining of PA and SI activities is known as a "Combined PA/SI Assessment" and is discussed in a separate measure. The decision to perform a "Combined PA/SI Assessment" is made during initial PA activities or even before a PA is conducted.

Regions have also been encouraged to further reduce repetitive tasks and costs by combining site assessment and removal evaluation activities where warranted by site conditions. This "Integrated Removal/Remedial Evaluation" activity is discussed in a separate measure.

Backlogs

The Site Inspection backlog consists of sites with a Non-NPL Status of either "SI start needed" or "SI ongoing".

Definition of Accomplishment:

SI Starts - A SI (Action Name = Site Inspection) start date at a non-Federal facility site is defined as the date when EPA or the State/Tribal government signs a letter, memo or form approving the site-specific SI work plan, or a Technical Direction Document (TDD) is issued to the contractor at a site (refer to OSWER Publication #9345.1-03 FS for further guidance on defining SI starts) and WasteLAN contains the actual SI start date (Actual Start) and an action lead of: "Fund-Financed (F)"; "EPA-In House (EP)"; "State (S)"; or "Tribal (TR)". SI start dates are required.

SI Completions - A SI (Action Name = Site Inspection) is completed when:

- A SI Report has been generated by EPA; or received by the region from the Federal contractor or State/Tribal government; and the appropriate Regional official signs a letter, form, or memo approving the SI report. The SI actual completion date is the date the SI report is approved; and
- WasteLAN contains the actual SI completion date (Actual Complete), a valid lead (Lead), and a “decision” on whether further activities are necessary in the Qualifier field; and
- The decision is documented by completing the Site Decision Form 9100-3 in WasteLAN or an equivalent document. The decision document must be printed, signed by the appropriate Regional official, and placed in the file.

Valid decisions to be recorded upon completion of a SI include:

(H) - High - Higher priority for further assessment Note: The next stage of assessment could be an ESI (Action Name = Expanded Site Inspection), an integrated ESI/RI (Action Name = ESI/RI), or preparation of an HRS package (Action Name = HRS Package); or

(L) - Low - Lower priority for further assessment; or

(N) - No further *remedial* action planned; or

(D) - Deferred to RCRA (Subtitle C); or

(DN) - Deferred to NRC; or

(A) - Site is being addressed as part of a NPL site. The site should also have an NPL Status Indicator (Site NPL Status) of ‘A’ and a valid value in the Parent Site ID field; or

(B) - Site is being addressed as part of another non-NPL site. The site should also have a Non-NPL Status of ‘Addressed as part of another non-NPL site’ (B) and a valid value in the Parent Site ID field; or

(F) - Referred to the removal program with further remedial assessment needed; or

(W) - Referred to the removal program with no further remedial assessment needed.

Changes in Definition FY 01 - FY 02/03:

Added qualifier “Site is being addressed as part of another non-NPL site.”

Special Planning/Reporting Requirements:

Planning dates are not required for SIs. Actual start and completion dates are required for SIs. SI starts (Actual Start) and completions (Actual Complete) are reported site-specifically in WasteLAN. Site Inspection starts and completions at non-Federal Facility sites are program measures.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into WasteLAN, the system automatically calculates a new value for this field based on the traditional sequence of site assessment work. Regions must confirm or change this value as appropriate.

i. COMBINED PA/SI ASSESSMENTS AT NON-FEDERAL FACILITY SITES

Definition:

Regions are encouraged to combine PA and SI activities where warranted by site conditions to reduce repetitive tasks and, ultimately, costs. The combining of PA and SI activities is known as a “Combined PA/SI Assessment”. The results of combined PA/SI assessment can be documented in one physical report, as long as the report contains all of the elements that would have been addressed under separate PA and SI reports. The report should state specifically that it covers both the PA and SI. The decision to conduct an SI as part of a combined assessment is made either prior to initiation of the PA or during initial phases of the PA and is documented in the initial task assignment provided to the contractor, by correspondence between EPA and the State, or by a form or memo to the file. As is the case with its individual components, a combined PA/SI is performed to determine what steps, if any, need to occur next at a site. Regions should employ FAS techniques wherever practical during PA/SI activities.

Regions are also encouraged to further reduce repetitive tasks and costs by combining site assessment and removal evaluation activities where warranted by site conditions. Combined PA/SI assessments may be applied in an integrated removal/remedial evaluation approach. Integrated Removal Assessment and Combined PA/SI (Action Name = Int. Rmvl Assess and Combined PA/SI) activities are entered as one action in WasteLAN and tracked as an internal planning measure.

Backlogs

The Combined PA/SI Assessment backlog consists of sites having a non-NPL status value of either “Combined PA/SI start needed” or “Combined PA/SI ongoing.”

Definition of Accomplishment:

Combined PA/SI Assessment Starts - A Combined PA/SI Assessment (Action Name = Combined PA/SI) starts when the region begins collecting data and performing other tasks related to development of the combined PA/SI assessment report; or when the region signs a letter, form, or memo to the EPA contractor or State/Tribal government (where applicable) requesting performance of a combined PA/SI assessment at a specific site or group of sites; or when EPA receives written confirmation from State/Tribal government that the State/Tribal government will conduct the combined PA/SI assessment. The actual start date (Actual Start) of the Combined PA/SI and a valid lead of: “Fund-Financed (F)”; “EPA-In House (EP)”; “State (S)”; or “Tribal (TR)”. Start dates are required.

Combined PA/SI Assessment Completions - A Combined PA/SI Assessment is completed when:

- A Combined PA/SI Report has been developed by EPA; or received by the region from the Federal contractor or State/Tribal government; and the appropriate Regional official signs a letter, form, or memo approving the Combined PA/SI report. The date the Combined PA/SI report is approved is entered into WasteLAN as the actual completion date of the Combined PA/SI; and
- The decision is documented by completing the Site Decision Form 9100-3 in WasteLAN, or an equivalent document. The decision document must be printed, signed by the appropriate Regional official, and placed in the file.

Valid decisions to be recorded in WasteLAN upon completion of the Combined PA/SI Assessment include:

(H) - High - Higher priority for further assessment Note: The next stage of assessment could be an ESI (Action Name = Expanded Site Inspection), an integrated ESI/RI (Action Name = ESI/RI), or preparation of an HRS package (Action Name = HRS Package); or

(L) - Low - Lower priority for further assessment; or

(N) - No further *remedial* action planned; or

(D) - Deferred to RCRA (Subtitle C); or

(DN) - Deferred to NRC; or

(A) - Site is being addressed as part of a NPL site. The site should also have an NPL Status Indicator (Site NPL Status) of 'A' and a valid value in the Parent Site ID field; or

(B) - Site is being addressed as part of another non-NPL site. The site should also have a Non-NPL Status of 'Addressed as part of another non-NPL site' (B) and a valid value in the Parent Site ID field; or

(F) - Referred to the removal program with further remedial assessment needed; or

(W) - Referred to the removal program with *no* further remedial assessment needed.

Changes in Definition FY 01 - FY 02/03:

Added qualifier "Site is being addressed as part of another non-NPL site."

Special Planning/Reporting Requirements:

Actual start and completion dates are required for combined PA/SIs. Combined PA/SI Starts (Actual start) and completions (Actual Complete) are reported site-specifically in WasteLAN. Combined PA/SI Assessment starts and completions at non-Federal Facility sites are program measures.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into WasteLAN, the system automatically calculates a new value for this field based on the traditional sequence of site assessment work. Regions must confirm or change this value as appropriate.

j. SITE INSPECTION PRIORITIZATIONS (SIPS) AT NON-FEDERAL FACILITY SITES

Definition:

SIPs (SubAction Name = Site Inspection Prioritization) require the gathering of additional information to update site inspections performed under the original Hazard Ranking System (HRS). SIPs are performed only at sites where the last SI was completed prior to August 1, 1992, and further evaluation is required to determine what steps, if any, need to occur next at the site. For most regions, the original SIP backlogs have been completed although a few still remain. SIPs are currently recorded in WasteLAN as SubActions (SubAction Name = Site Inspection Prioritization) to the last completed site inspection event (Action Name = Site Inspection).

In general, a finite number of sites were originally identified as needing SIPs and EPA has completed SIPs at nearly all of these sites. Nonetheless, EPA anticipates that a number of older sites addressed under the original HRS, which were not part of the original universe of sites needing SIPs, may now require SIPs based on new information received by EPA. This would apply to sites that were evaluated and assigned a NFRAP or Deferred decision under the original HRS prior to August 1, 1992, for which new information has been provided to EPA indicating further Superfund evaluation of the site is warranted.

Regions should employ FAS techniques wherever practical during SIP activities.

Backlogs

The Site Inspection Prioritization backlog consists of sites having a non-NPL status value of either "SIP start needed" or "SIP ongoing."

Definition of Accomplishment:

SIP Starts - A SIP start is defined as the date the region signs a letter, form, or memo requesting a SIP be performed at a specific site. The date should be entered into WasteLAN as the actual start date (Actual Start) of the SIP SubAction. Valid leads for SIPs include: "Fund-Financed (F)"; "EPA In-House (EP)"; "State (S)"; or "Tribal (TR)". SIP start dates are required, and are used by HQ as a program measure.

SIP Completions - A SIP (SubAction Name = Site Inspection Prioritizations) is complete when:

- A SIP Report has been developed by EPA; or received by the region from the Federal contractor or State/Tribal government; and the appropriate Regional official signs a letter, form, or memo approving the SIP report. The SIP actual completion date is the date the SIP report is approved; and
- WasteLAN contains the actual SIP completion date (Actual Complete), and a "decision" on whether further activities are necessary is recorded in the Qualifier field for the SubAction; and
- The decision is documented by completing the Site Decision Form 9100-3 in WasteLAN or an equivalent document. The decision document must be printed, signed by the appropriate Regional official, and placed in the file.

Valid decisions at the conclusion of a SIP include:

(H) - High - Higher priority for further assessment Note: The next stage of assessment could be an expanded site inspection (Action Name = Expanded Site Inspection), an integrated ESI/RI (Action Name = ESI/RI), or preparation of an HRS package (Action Name = HRS Package); or

(L) - Low - Lower priority for further assessment; or

(N) - No further *remedial* action planned; or

(D) - Deferred to RCRA (Subtitle C); or

(DN) - Deferred to NRC; or

(A) - Site is being addressed as part of a NPL site. The site should also have an NPL Status Indicator (Site NPL Status) of 'A' and a valid value in the Parent Site ID field; or

(B) - Site is being addressed as part of another non-NPL site. The site should also have a Non-NPL Status of 'Addressed as part of another non-NPL site' (B) and a valid value in the Parent Site ID field; or

(F) - Referred to the removal program with further remedial assessment needed; or

(W) - Referred to the removal program with *no* further remedial assessment needed.

Changes in Definition FY 01 - FY 02/03:

Added qualifier "Site is being addressed as part of another non-NPL site."

Special Planning/Reporting Requirements:

Actual start and completion dates are required for SIPs. SIP starts (Actual Start) and completions (Actual Complete) are reported site-specifically in WasteLAN. Decisions reached at the conclusion of SIP activities must be recorded with the SIP SubAction. Site Inspection Prioritization starts and completions at non-Federal facility sites are program measures.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into WasteLAN, the system automatically calculates a new value for this field based on the traditional sequence of site assessment work. Regions must confirm or change this value as appropriate.

k. SITE REASSESSMENT

Definition:

A Site Reassessment represents the gathering and evaluation of new information on a site previously assessed under the Federal Superfund Program to determine whether further Superfund attention is needed. A Site Reassessment serves as a supplement to previous assessment work, and not as a replacement for traditional assessment activities (e.g., Preliminary Assessment, Site Inspection). The scope of work for a Site Reassessment activity is flexible, but will usually represent a component of a traditional site assessment action. The intent of the Site Reassessment action is to document the expenditure of Superfund resources on older sites where EPA has received new information or learned that site conditions have changed. This action is also used to record further assessment decisions made after reviewing this new site information. A brief summary of work performed as part of the Site Reassessment action and the related site decision as a result of this work must be documented by completing the Site Decision Form 9100-3 in WasteLAN, or an equivalent document. Correction of site disposition decisions (i.e., action qualifiers) based solely on file reviews should be documented using the historical lockout feature in WasteLAN and not as a new Site Reassessment action.

Definition of Accomplishment:

Site Reassessment Starts - A Site Reassessment (Action Name = Site Reassessment) start is defined as the date when EPA or State/Tribal government signs a letter, memo or form approving the site-specific Site Reassessment work plan or a TDD is issued to the contractor at a site and WasteLAN contains the actual Site Reassessment start date (Actual Start) and an action lead (Lead) of: "Fund-Financed (F)"; "EPA-In House (EP)"; "State (S)"; or "Tribal (TR)".

Site Reassessments Completions - A Site Reassessment (Action Name = Site Reassessment) is complete when:

- A Site Reassessment report has been developed by EPA, or received by the region from the Federal contractor, or the State/Tribal government, and the appropriate Regional official signs a letter, form, or memo approving the Site Reassessment report. The Site Reassessment actual completion date is the date the Site Reassessment report is approved, and
- WasteLAN contains the actual Site Reassessment completion date (Actual Complete), a valid lead (Lead), and a valid "decision" on whether further activities are necessary in the Qualifier field; and
- The decision is documented by completing the Site Decision Form 9100-3 in WasteLAN or an equivalent document. The decision document must be printed, signed by the appropriate Regional official, and placed in the file.

Valid decisions to be recorded upon completion of the Site Reassessment include:

(H) - High - High priority for further assessment; or

(L) - Low - Lower priority for further assessment; or

(N) - No further *remedial* action planned; or

(D) - Deferred to RCRA (Subtitle C); or

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(DN) - Deferred to NRC; or

(A) - Site is being addressed as part of a NPL site. The site should also have an NPL Status Indicator (Site NPL Status) of 'A' and a valid value in the Parent Site ID field; or

(B) - Site is being addressed as part of another non-NPL site. The site should also have a Non-NPL Status of 'Addressed as part of another non-NPL site' (B) and a valid value in the Parent Site ID field; or

(F) - Referred to the removal program with further remedial assessment needed; or

(W) - Referred to the removal program with *no* further remedial assessment needed.

Changes in Definition FY 01 - FY 02/03:

Added qualifier "Site is being addressed as part of another non-NPL site."

Special Planning/Reporting Requirements:

Planning dates are not required for Site Reassessment. Actual start and completion dates are required for Site Reassessment. Site Reassessment starts (Actual Start) and completions (Actual Complete) are reported site-specifically in WasteLAN. Site Reassessment starts and completions are program measures for non-Federal facilities.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into WasteLAN, the system automatically calculates a new value for this field based on the traditional sequence of site assessment work. Regions must confirm or change this value as appropriate.

1. EXPANDED SITE INSPECTIONS (ESI) AT NON-FEDERAL FACILITY SITES

Definition:

The ESI (Action Name = Expanded Site Inspection) collects additional data beyond that collected in the SI to evaluate the site for HRS scoring. ESIs are reserved for more complex sites that cannot be adequately characterized using standard SI methodologies. Installation of groundwater monitoring wells is typical of activities performed under the ESI.

Regions also have been encouraged to further reduce repetitive tasks and costs by combining site assessment and removal evaluation activities where warranted by site conditions. This is called an integrated removal/remedial evaluation (Action Name = Int. Rmvl Assess and Expanded Site Inspection).

Regions should employ FAS techniques wherever practical during ESI activities.

Backlogs

The Expanded Site Inspection backlog consists of sites where the Non-NPL Status is either "ESI start needed" or "ESI ongoing".

Definition of Accomplishment:

ESI Starts - An ESI (Action Name = Expanded Site Inspection) start is defined as the date when EPA or State/Tribal government signs a letter, memo or form approving the site specific ESI work plan or a Technical Direction Document is issued to the contractor at a site and WasteLAN contains the actual ESI start date (Actual Start) and an action lead (Lead) of: "Fund-Financed (F)"; "EPA-In House (EP)"; "State (S)"; or "Tribal (TR)".

ESI Completions - An ESI (Action Name = Expanded Site Inspection) is complete when:

- An ESI Report has been developed by EPA ; or received by the region from the Federal contractor; or the State/Tribal government; and the appropriate Regional official signs a letter, form, or memo approving the ESI report; the ESI actual completion date is the date the ESI report is approved; and
- WasteLAN contains the actual ESI completion date (Actual Complete), a valid lead (Lead), and a valid “decision” on whether further activities are necessary in the Qualifier field; and
- The decision is documented by completing the Site Decision Form 9100-3 in WasteLAN or an equivalent document. The decision document must be printed, signed by the appropriate Regional official, and placed in the file.

Valid decisions to be recorded upon completion of the ESI include:

(G) - Recommended for HRS Scoring (i.e., development of HRS package, Action Name = HRS Package); or

(L) - Low - Lower priority for further assessment; or

(N) - No further *remedial* action planned; or

(D) - Deferred to RCRA (Subtitle C); or

(DN) - Deferred to NRC; or

(A) - Site is being addressed as part of a NPL site. The site should also have an NPL Status Indicator (Site NPL Status) of ‘A’ and a valid value in the Parent Site ID field; or

(B) - Site is being addressed as part of another non-NPL site. The site should also have a Non-NPL Status of ‘Addressed as part of another non-NPL site’ (B) and a valid value in the Parent Site ID field; or

(F) - Referred to the removal program with further remedial assessment needed; or

(W) - Referred to the removal program with *no* further remedial assessment needed.

Changes in Definition FY 01 - FY 02/03:

Added qualifier “Site is being addressed as part of another non-NPL site.”

Special Planning/Reporting Requirements:

Planning dates are not required for ESIs. Actual start and completion dates are required for ESIs. ESI starts (Actual Start) and completions (Actual Complete) are reported site-specifically in WasteLAN. ESI starts and completions are program measures for non-Federal facilities.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into WasteLAN, the system automatically calculates a new value for this field based on the traditional sequence of site assessment work. Regions must confirm or change this value as appropriate.

m. FEDERAL FACILITY SI REVIEWS

Definition:

A Federal facility SI Review (Action Name = Federal Facility SI Review) is an EPA quality assurance review of a SI report submitted by another Federal agency. EPA’s involvement in SI activities at Federal facilities differs from that at non-Federal facilities. While EPA conducts or funds development of SIs at non-Federal facilities, EPA’s role at Federal

OSWER Directive 9200.3-14-1 G-P

facilities is limited to reviewing SI reports developed and submitted by the Federal agencies responsible for a given Federal facility. Upon reviewing the SI for completeness, and working with the other Federal agency to address any deficiencies, EPA then determines what next steps are appropriate with respect to NPL listing.

Backlogs

The Federal Facility SI Review backlog consists of sites with a Non-NPL Status of “FF-SI review needed” or “FF-SI review ongoing.”

Definition of Accomplishment:

Federal Facility SI Review Starts - A Federal facility SI review (Action Name = Federal Facility SI Review) is started when EPA starts in-house review of the Federal Facility SI report, or sends a letter, form, or memo to the EPA contractor requesting review of the Federal facility SI report; and WasteLAN contains the actual Federal Facility SI Review start date (Actual Start) and a valid action lead of “Fund-Financed (F)”; “EPA-In House (EP)”; “State (S)”; or “Tribal (TR)”.

Federal Facility SI Review Completions - A Federal facility SI Review (Action Name = Federal Facility SI Review) is completed when:

- The appropriate Regional official signs a letter, form, or memo approving the Federal facility SI report. The date the Federal facility SI report is approved is entered into WasteLAN as the actual completion date of the Federal facility SI report; and
- WasteLAN contains the actual completion date (Actual Complete) of the Federal Facility SI Review, a lead and a valid “decision” on whether further activities are necessary in the Qualifier field; and
- The decision is documented by completing the Site Decision Form 9100-3 in WasteLAN or an equivalent document. The decision document must be printed, signed by the appropriate Regional official, and placed in the file.

Valid decisions to be recorded upon completion of Federal facility SI reviews include:

(H) - High - Higher priority for further evaluation/HRS Scoring; or

(L) - Low - Lower priority for further assessment; or

(N) - No further *remedial* action planned; or

(A) - Site is being addressed as part of a NPL site. The site should also have an NPL Status Indicator (Site NPL Status) of ‘A’ and a valid value in the Parent Site ID field; or

(B) - Site is being addressed as part of another non-NPL site. The site should also have a Non-NPL Status of ‘Addressed as part of another non-NPL site’ (B) and a valid value in the Parent Site ID field; or

(D) - Deferred to RCRA; or

(DN) - Deferred to NRC.

Changes in Definition FY 01 - FY 02/03:

Added qualifier “Site is being addressed as part of another non-NPL site.”

Special Planning/Reporting Requirements:

Planning dates are not required for Federal facility SI reviews. Actual start and completion dates are required for Federal facility SI reviews. Federal facility SI Review starts (Actual Start) and completions (Actual Complete) are reported site-specifically in WasteLAN. Federal facility SI Review starts and completions are program measures.

If the Federal facility SI report does not provide sufficient information to make a NPL assessment decision, the report should be referred back to the Federal facility (SubAction Name = Referred back to Fed Fac). The date the report is referred back to the Federal facility is entered into WasteLAN as the actual completion date (Actual Complete). The actual completion date and qualifier for the Federal Facility Site Inspection Review should not be entered until all the report deficiencies have been addressed.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into WasteLAN, the system automatically calculates a new value for this field based on the traditional sequence of site assessment work. Regions must confirm or change this value as appropriate.

n. FEDERAL FACILITY ESI REVIEWS

Definition:

A Federal facility ESI Review (Action Name = Federal Facility ESI Review) is an EPA quality assurance review of an ESI report submitted by another Federal agency. EPA's involvement in ESI activities at Federal facilities differs from that at non-Federal facilities. While EPA conducts or funds development of ESIs at non-Federal facilities, EPA's role at Federal facilities is limited to reviewing ESI reports developed and submitted by the Federal agencies responsible for a given Federal facility. Upon reviewing the ESI for completeness, and working with the other Federal agency to address any deficiencies, EPA then determines what next steps are appropriate with respect to NPL listing.

Backlogs

The Federal Facility ESI Review backlog consists of sites having a Non-NPL Status of "FF-ESI review needed" or FF-ESI review ongoing".

Definition of Accomplishment:

Federal Facility ESI Review Starts - A Federal facility ESI review (Action Name = Federal Facility ESI Review) is started when EPA starts in-house review of the Federal Facility ESI report, or sends a letter, form, or memo to the EPA contractor requesting review of the Federal Facility ESI report; and WasteLAN contains the actual Federal Facility ESI Review start date (Actual Start) and a valid action lead of "Fund-Financed (F)"; "EPA-In House (EP)"; "State (S)"; or "Tribal (TR)".

Federal Facility ESI Review Completions - A Federal Facility ESI Review (Action Name = Federal Facility ESI Review) is completed when:

- The appropriate Regional official signs a letter, form, or memo approving the Federal facility ESI report. The date the Federal facility ESI report is approved is entered into WasteLAN as the actual completion date of the Federal Facility, ESI report; and
- WasteLAN contains the actual completion date (Actual Complete) of the Federal Facility ESI Review, a lead (Lead), and a valid "decision" on whether further activities are necessary in the Qualifier field; and
- The decision is documented by completing the Site Decision Form 9100-3 in WasteLAN or an equivalent document. The decision document must be printed, signed by the appropriate Regional official, and placed in the file.

Valid decisions to be recorded upon completion of Federal facility ESI reviews include:

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(G) - Recommended for HRS Scoring; or

(L) - Low - Lower priority for further assessment; or

(N) - No further *remedial* action planned; or

(A) - Site is being addressed as part of a NPL site. The site should also have an NPL Status Indicator (Site NPL Status) of 'A' and a valid value in the Parent Site ID field; or

(B) - Site is being addressed as part of another non-NPL site. The site should also have a Non-NPL Status of 'Addressed as part of another non-NPL site' (B) and a valid value in the Parent Site ID field; or

(D) - Deferred to RCRA; or

(DN) - Deferred to NRC.

Changes in Definition FY 01 - FY 02/03:

Added qualifier "Site is being addressed as part of another non-NPL site."

Special Planning/Reporting Requirements:

Planning dates are not required for Federal facility ESI reviews. Actual start and completion dates are required for Federal facility ESI reviews. Federal Facility ESI Review starts (Actual Start) and completions (Actual Complete) are reported site-specifically in WasteLAN. Federal Facility ESI Review starts and completions are program measures.

If the Federal facility ESI report does not provide sufficient information to make a NPL assessment decision, the report should be referred back to the Federal facility (SubAction Name = Referred back to Fed Fac). The date the report is referred back to the Federal facility is entered into WasteLAN as the actual completion date (Actual Complete). The actual completion date and qualifier for the Federal Facility Expanded Site Inspection Review should not be entered until all the report deficiencies have been addressed.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into WasteLAN, the system automatically calculates a new value for this field based on the traditional sequence of site assessment work. Regions must confirm or change this value as appropriate.

o. INTEGRATED EXPANDED SITE INSPECTION/REMEDIAL INVESTIGATION (ESI/RI) AT NON-FEDERAL FACILITY SITES

Definition:

The integrated ESI/RI (Action Name = ESI/RI) is an assessment consisting of an ESI and a RI. The ESI/RI is used to expedite remedial response by gathering site characterization data common to both ESI and RI activities in one step, thereby expediting the later collection of data when comprehensive RI activities are performed. The goal of ESI/RIs is to save time and costs characterizing sites when compared to the traditional, sequential ESI-NPL Listing-RI process. ESI/RIs facilitate but do not replace RIs, and are recommended at sites where conditions indicate that the HRS score will be above 28.5 and a remedial response will be needed. The RI portion of an ESI/RI is intended to be a site-wide activity. ESI/RI actions should be entered into WasteLAN at operable unit '00'.

ESI/RIs may not always be feasible given known site conditions and activities completed to date. In some cases, it may be more prudent to conduct a separate ESI and RI. The definitions for RI/FS Completion and RI Completion (see

definitions in Appendix B) are different from the definition for ESI/RI Completion. The definition of an ESI/RI Completion is the same as that of an ESI Completion. If an ESI/RI action is recorded in WasteLAN, a stand-alone ESI event (Action Name = Expanded Site Inspection) should not be recorded at that site.

Regions are also encouraged to further reduce repetitive tasks and costs by combining site assessment and removal evaluation activities where warranted by site conditions. This is called an integrated removal/remedial evaluation (Action Name = Int Rmvl Assess and ESI/RI) and is further discussed in a separate section below.

Backlogs

The ESI/RI backlog consists of sites with a Non-NPL Status of either “Integrated ESI/RI start needed” or “Integrated ESI/RI ongoing”.

Definition of Accomplishment:

ESI/RI Starts - ESI/RI (Action Name = ESI/RI) start date is defined as the date when EPA approves the site-specific ESI/RI work plan and WasteLAN contains the actual ESI/RI start date (Actual Start) and an action lead of: “Fund-Financed (F)”; “EPA-In House (EP)”; “State (S)”; or “Tribal (TR)”.

ESI/RI Completions - An ESI/RI (Action Name = ESI/RI) is complete when:

- An ESI/RI Report has been reviewed and accepted by the region and the appropriate Regional official signs a letter, form, or memo approving the ESI/RI report. The ESI/RI actual completion date is the date the ESI/RI report is approved; and
- The following has been recorded in WasteLAN: the actual ESI/RI completion date (Actual Complete); a valid lead (Lead); and a “decision” on whether further activities are necessary in the Qualifier field; and
- The decision is documented by completing the Site Decision Form 9100-3 in WasteLAN or an equivalent document. The decision document must be printed, signed by the appropriate Regional official, and placed in the file.

Valid decisions to be recorded upon completion of the ESI/RI include:

(G) - Recommended for HRS Scoring (i.e., development of HRS package, Action Name = HRS Package); or

(L) - Low - Lower priority for further assessment; or

(N) - No further *remedial* action planned; or

(A) - Site is being addressed as part of a NPL site. The site should also have an NPL Status Indicator (Site NPL Status) of ‘A’ and a valid value in the Parent Site ID field; or

(B) - Site is being addressed as part of another non-NPL site. The site should also have a Non-NPL Status of ‘Addressed as part of another non-NPL site’ (B) and a valid value in the Parent Site ID field; or

(F) - Referred to the removal program with further remedial assessment needed; or

(W) - Referred to the removal program with *no* further remedial assessment needed; or

(D) - Deferred to RCRA; or

(DN) - Deferred to NRC.

Changes in Definition FY 01 - FY 02/03:

Added qualifier "Site is being addressed as part of another non-NPL site."

Special Planning/Reporting Requirements:

Planned start and completion dates are not required for ESI/RIs. Actual start and completion dates are required for ESI/RIs. ESI actions (Action Name = Expanded Site Inspection) should not be recorded separately in WasteLAN if they are conducted as part of an ESI/RI. ESI/RI starts and completions at non-Federal Facility sites are program measures.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into WasteLAN, the system automatically calculates a new value for this field based on the traditional sequence of site assessment work. Regions must confirm or change this value as appropriate.

p. STATE DEFERRAL OF NON-FEDERAL FACILITY SITES

Definition:

State Deferral (Action Name = State Deferral) is an administrative mechanism enabling States and Tribes, under their own laws, to respond at sites in the CERCLIS inventory that EPA would otherwise not soon address. Under the State Deferral program, EPA anticipates that responses may be quick and efficient, yet still be protective of the environment and of communities' rights to participate in the decision-making process. Refer to the "Guidance on Deferral of NPL Listing Determinations While States Oversee Response Actions" (OSWER Directive 9375.6-11, May 1995) for additional information on this program.

Backlogs

The State Deferral backlog consists of CERCLIS sites with a Non-NPL Status of "Deferral of NPL listing decision while States oversee response".

Definition of Accomplishment:

State Deferral Starts - The State Deferral (Action Name = State Deferral) process start is defined as the date when the Regional Superfund program director and the State program director sign a document deferring the site to the State under the terms established in the deferral guidance. A State Deferral action must be recorded in WasteLAN with an action lead (Lead) of "State Deferral (SD)". State deferrals are applicable only to non-Federal facility sites that are not on the NPL.

State Deferral Completions The State Deferral (Action Name = State Deferral) completion date is defined as either: 1) the signature date of a formal regional document confirming that the deferral has been completed successfully, or terminating the deferral agreement; or 2) 90 days after the date EPA receives State certification that the deferral has been completed. The outcome (Qualifier) of the State deferral must be entered with the completion date.

Valid outcomes (Qualifiers) to be recorded upon completion of the State Deferral include:

(RS) - Region confirmed successful deferral completion; or

(RT) - Region terminated deferral.

Changes in Definition FY 01 - FY 02/03:

None.

Special Planning/Reporting Requirements:

Six SubActions can be entered for the State Deferral action to generically capture the different cleanup phases a site may be undergoing. These SubActions include:

1. Comprehensive Site Investigation (SubAction Name = Comprehensive Site Investigation)
2. Remedy Selection (SubAction Name = Remedy Selection);
3. Design (SubAction Name = Design);
4. Construction (SubAction Name = Construction); and
5. Post-Construction Maintenance (SubAction Name = Post Construction Maintenance)
6. Short Term Cleanup (SubAction Name = Short Term Cleanup)

SubAction start and completion dates and SubAction lead codes are available for documenting the start and completion of the different cleanup phases being conducted at non-NPL sites by non-EPA parties.

Planned start and completion dates are not required for State Deferral actions. Actual start and completion dates are required. Sites successfully completing the deferral process are eligible for archiving (removal) from the CERCLIS inventory. State Deferral starts and completions are program measures.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into WasteLAN, the system automatically calculates a new value for this field based on the traditional sequence of site assessment work. Regions must confirm or change this value as appropriate.

q. HAZARD RANKING SYSTEM PACKAGE (HRS)**Definition:**

The HRS Package (Action Name = HRS Package) documents a numeric score of the relative severity of a hazardous substance release or potential release based on: (1) the relative potential of substances to cause hazardous situations; (2) the likelihood and rate at which the substances may affect human and environmental receptors; and (3) the severity and magnitude of potential effects. The HRS Package also includes references and documentation in support of the score. The score is computed using the revised Hazard Ranking System (HRS). Regions are responsible for preparing HRS packages for both Federal and non-Federal facility sites. Regions submit a draft version of the HRS package to HQ for quality assurance review. Regions and HQ work together to address issues and agree on a final version of the HRS package. Based on results of the completed HRS package and other factors, regions determine what the next steps, if any, are appropriate for a site (e.g., NPL listing, NFRAP, etc.)

Backlogs

The HRS backlog consists of sites having Non-NPL Status of either “HRS start needed” or “HRS ongoing”.

Definition of Accomplishment:

HRS Package Starts - An HRS Package (Action Name = HRS Package) start is defined as the date when EPA signs a memo, form, or letter requesting development of a HRS Package for a specific site and WasteLAN contains the actual HRS Package start date (Actual Start) and a valid action lead of “Fund-Financed (F)”; “EPA-In House (EP)”; “State (S)”; or “Tribal (TR)”. HRS Package start dates are required for both Federal and non-Federal facility sites, and are used to identify the status of sites in the site assessment pipeline and to measure activity durations. Due to the pre-decisional nature of HRS packages, regions may postpone entry of HRS start dates until after the HRS package has gone through HQ quality assurance review or after the site has been proposed to the NPL.

HRS Package Completions - An HRS Package (Action Name = HRS Package) is complete when:

- An HRS Package has completed HQ quality assurance review and HQ and the region agree to a final version; and
- The following has been recorded in WasteLAN: the approval date for the final version of the HRS Package date as the actual HRS Package completion date (Actual Complete), a lead (Lead), and a “decision” on whether further activities are necessary in the Qualifier field. Since HRS packages are pre-decisional, entry of HRS Package completion dates in WasteLAN may be delayed until after the site is proposed to the NPL, if applicable; and
- The decision is documented by completing the Site Decision Form 9100-3 in WasteLAN or an equivalent document. The decision document must be printed, signed by the appropriate Regional official, and placed in the file.

Note: Submission of HRS Packages to HQ for technical assistance does not represent an HRS Package completion.

Valid decisions to be recorded upon completion of the HRS Package include:

(O) - Site is being considered for proposal to the NPL; or

(N) - No further *remedial* action planned; or

(W) - Referred to the removal program with *no* further remedial assessment needed; or

(F) - Referred to the removal program with further remedial assessment needed; or

(D) - Deferred to RCRA; or

(DN) - Deferred to NRC.

Changes in Definition FY 01 - FY 02/03:

None.

Special Planning/Reporting Requirements:

Planned start and completion dates are not required for HRS Packages. Actual start and completion dates are required for HRS Packages. HRS Package starts and completions at both Federal and non-Federal Facilities are program measures.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into WasteLAN, the system automatically calculates a new value for this field based on the traditional sequence of site assessment work. Regions must confirm or change this value as appropriate.

r. INTEGRATED REMOVAL/REMEDIAL EVALUATION

Definition:

Integrated Removal/Remedial Evaluations are actions integrating both site assessment (e.g., Preliminary Assessment, Site Inspection) and removal assessment activities to reduce the overall time and money spent characterizing site conditions. The scope of the Integrated Removal/Remedial Evaluation will depend on which activities are being jointly conducted. Seven specific types of Integrated Removal/Remedial Evaluations will be tracked:

- Integrated Removal Assessments and Preliminary Assessments (Action Name = Int Rmvl Assess and Preliminary Assessment);
- Integrated Removal Assessments and Site Inspections (Action Name = Int Rmvl Assess and Site Inspection);
- Integrated Removal Assessments and Combined PA/SI (Action Name = Int Rmvl Assess and Combined PA/SI);
- Integrated Removal Assessments and Expanded Site Inspections (Action Name - Int. Rmvl Assess and Expanded Site Inspection);
- Integrated Removal Assessments and Hazard Ranking System (Action Name = Int. Rmvl Assess and HRS Package);
- Integrated Removal Assessments and ESI/RI (Action Name = Int. Rmvl Assess and ESI/RI); and
- Integrated Removal Assessments and Site Inspection Prioritizations (SubAction Name = Int Rmvl Assess and Site Inspection Prioritization).

Regions are encouraged to make use of integrated assessment approaches wherever appropriate. Requirements of site assessment actions (e.g., PA, SI) and removal assessments must still be met, even though they are conducted in an integrated fashion. Refer to appropriate sections of the SPIM and Superfund assessment guidance documents for further requirements of stand-alone assessment activities. The definitions and special planning/reporting requirements for all seven types of Integrated Removal/Remedial Evaluations listed above follow the same general concept. Generic definitions and requirements are provided below.

For more information on Integrated Removal/Remedial Assessments, please see OERR's Quick Reference Guidance Series document titled: "Improving Site Assessment: Integrated Removal and Remedial Site Evaluations" OSWER 9360.0-39FS, PB99-963314; dated April 2000.

Regions should employ FAS techniques wherever practical during Integrated Removal/Remedial Evaluation activities.

Backlogs

The Integrated Removal/Remedial Evaluation backlog consists of sites having a Non-NPL Status of "Integrated Removal/Remedial evaluation needed" or "Integrated Removal/Remedial evaluation ongoing".

Definition of Accomplishment:

Starts - An Integrated Removal/Remedial Evaluation (Action Name = Int. Rmvl Assess and Preliminary Assessment, Int. Rmvl Assess and Site Inspection, Int. Rmvl Assess and Expanded Site Inspection, Int. Rmvl Assess and Combined PA/SI, Int. Rmvl Assess and ESI/RI, and Int. Rmvl Assess and HRS Package) and (Subaction Name = Int. Rmvl Assess and Site Inspection Prioritization) start date is defined as the date when EPA approves the site-specific Integrated Removal/Remedial Evaluation work plan (e.g., Removal Assessment and SI work plan) and WasteLAN contains:

- The actual Integrated Removal/Remedial Assessment start date (Actual Start) and an action lead (Lead) of: "Fund-Financed (F)"; "EPA-In House (EP)"; "State (S)"; or "Tribal (TR)"; and

Completions - An Integrated Removal/Remedial Evaluation (Action Name = Int. Rmvl Assess and Preliminary Assessment, Int. Rmvl Assess and Site Inspection, Int. Rmvl Assess and Expanded Site Inspection, Int. Rmvl Assess and Combined PA/SI, Int. Rmvl Assess and ESI/RI, and Int. Rmvl Assess and HRS Package) and (Subaction Name = Int. Rmvl Assess and Site Inspection Prioritization) is complete when:

- The Integrated Removal/Remedial Evaluation report has been reviewed and accepted by the region and an appropriate Regional official signs a letter, form, or memo approving the report. The report must contain all of the information required for the related site assessment and must document the completion of a Removal Assessment to determine whether a removal action is necessary. A note to the site file must also be prepared indicating that the Integrated Removal/Remedial Evaluation report meets all the requirements for the related assessment activities; and

- The Integrated Removal/Remedial Evaluation report approval date is entered into WasteLAN as the actual Integrated Removal/Remedial Assessment completion date (Actual Complete) with a valid lead (Lead); and
- The decision is documented by completing the Site Decision Form 9100-3 in WasteLAN or an equivalent document. The decision document must be printed, signed by the appropriate Regional official, and placed in the file.

A “decision” on whether further activities are necessary is entered into WasteLAN in the Action Qualifier field.

Valid Integrated Assessment action qualifiers include:

(H) - High - Higher priority for further assessment. Note: The next stage of assessment could be an SI (Action Name= Site Inspection), expanded site inspection (Action Name=Expanded Site Inspection), an integrated ESI/RI (Action Name=ESI/RI), or preparation of an HRS package (Action Name = HRS Package), or consideration for proposal to the NPL; or

(L) - Low - Lower priority for further assessment; or

(N) - No further *remedial* action planned; or

(D) - Deferred to RCRA (Subtitle C); or

(DN) - Deferred to NRC; or

(A) - Site is being addressed as part of a NPL site. The site should also have an NPL Status Indicator (Site NPL Status) of ‘A’ and a valid value in the Parent Site ID field; or

(B) - Site is being addressed as part of another non-NPL site. The site should also have a Non-NPL Status of ‘Addressed as part of another non-NPL site’ (B) and a valid value in the Parent Site ID field; or

(F) - Referred to the removal program with further remedial assessment needed; or

(W) - Referred to the removal program with *no* further remedial assessment needed; or

(G) - Recommended for HRS scoring. This qualifier should be used only for Int. Rmvl Assess and ESI or Int. Rmvl Assess and ESI/RI.

Changes in Definition FY 01 - FY 02/03:

Added qualifier “Site is being addressed as part of another non-NPL site.” Added separate actions/subaction for each integrated assessment. The data entry will be reduced from adding three actions (Removal Assessment, Integrated Assessment and the corresponding Site Assessment action) to one action or subaction.

Special Planning/Reporting Requirements:

Planning dates are not required for Integrated Assessments. Actual start and completion dates are required for Integrated Assessments. Integrated Assessment action qualifiers are required. Integrated Removal Assessment and PA, Integrated Removal Assessment and Site Inspection, Integrated Removal Assessment and Combined PA/SI, Integrated Removal Assessment and Expanded Site Inspection, Integrated Removal Assessment and Site Inspection Prioritization, Integrated Removal Assessment and ESI/RI and Integrated Removal Assessment and HRS Package starts and completions at non-Federal facilities are program measures.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into WasteLAN, the system automatically calculates a new value for this field based on the traditional sequence of site assessment work. Regions must confirm or change this value as appropriate.

s. NPL LISTING

Definition:

The NPL is a list of national priorities among the known or threatened releases of hazardous substances, pollutants, or contaminants throughout the United States and trust territories. There are three mechanisms for placing sites on the NPL for possible remedial action:

- A site may be included on the NPL if it scores sufficiently high on the Hazard Ranking System (HRS). The HRS serves as a screening device to evaluate the relative threat that uncontrolled hazardous substances pose to human health or the environment. As a matter of Agency policy, those sites that score 28.50 or greater on the HRS are eligible for the NPL.
- Each State may designate a single site as its top priority to be listed on the NPL, regardless of the HRS score.
- Certain sites may be listed regardless of their HRS score, if all of the following conditions are met:
 - The Agency for Toxic Substances and Disease Registry (ATSDR) of the U.S. Public Health Service has issued a health advisory that recommends dissociation of individuals from the release; and
 - EPA determines that the release poses a significant threat to public health; and
 - EPA anticipates that it will be more cost-effective to use its remedial authority than to use its removal authority to respond to the release.

Backlogs

In general, the backlog for proposing sites to the NPL consists of sites having a Non-NPL Status of "HRS Package Completed - Further Evaluation Needed".

Definition of Accomplishment:

Proposed NPL Listing - The process of proposing a site for placement on the NPL is complete (Actual Complete date) when a Proposed Rule proposing the site to the NPL [Action Name = Proposal to NPL] is published in the *Federal Register*.

Removal of Proposed NPL Listing - The process of removing a site from the list of proposed NPL sites starts (Actual Start date) when a proposal to remove the site is published in the *Federal Register* and is complete (Actual Complete date) when final notice of the removal is published in the *Federal Register* [Action Name = Removed from the Proposed NPL].

Final NPL Listing - The listing process for a site is complete (Actual Complete date) when a Final Rule adding the site to the NPL [Action Name = Final Listing on NPL] is published in the *Federal Register*.

Withdrawn from the Final NPL - The process of withdrawing a site is complete (Actual Complete date) when a Final Rule withdrawing the site [Action Name - Withdrawn from the NPL] is published in the *Federal Register*.

Changes in Definition FY 01 - FY 02/03:

Added Federal Register dates as HQ responsibility.

Special Planning/Reporting Requirements:

The following data are to be entered into WasteLAN:

Regional Responsibility

Regions are responsible for entering the following site-related information.

- Site name (Listing Site Name will not be editable)
- EPA Site ID
- Street Address
- City
- County
- State
- Zip Code
- Region
- Congressional district
- Regional Latitude and Longitude

HQ Responsibility

- The NPL listing Actions (Proposal to NPL, Removed from Proposed NPL, Final Listing on NPL, Withdrawn from the NPL, and Deleted from the NPL);
- The actual completion date for these actions;
- An action lead of Fund-financed (F);
- The NPL Status of “Proposed for NPL (P)”, Removed from list of proposed NPL sites (R)”, “Currently on Final NPL (F)”, “Withdrawn from NPL (W)”, and “Deleted from the NPL (D)”;
- The *Federal Register* citation;
- The Federal facility status; and
- *Federal Register* dates.

NOTE:

Further information on Deletion and Partial Deletion from the NPL can be found in Appendix B of this Manual. NPL Listing is a program measure.

t. OTHER CLEANUP ACTIVITY

Definition:

This action is used to document cleanup work at non-NPL sites being conducted by non-EPA parties without EPA enforcement or oversight.

Definition of Accomplishment:

Other Cleanup Activity Starts - An Other Cleanup Activity (Action Name = Other Cleanup Activity) start date is defined as the date the non-EPA party begins cleanup work at a non-NPL site. Valid leads for Other Cleanup Activity are: State Enforcement (SE), PRP Lead Under State (SR), State (S), No Fund Money (SN), Tribal (TR), Federal Facility (FF), PRP Response Under State (PS), and PRP (RP).

Other Cleanup Activity Completions - An Other Cleanup Activity (Action Name = Other Cleanup Activity) complete date is defined as the date the non-EPA party completes/completed cleanup work at a non-NPL site. The following action qualifiers are available for this action:

(H) - High - Higher priority; and

(L) - Low - Lower priority; and

(Blank) - No qualifier specified.

Changes in Definition FY 01 - FY 02/03:

None.

Special Planning/Reporting Requirements:

The following six SubActions should be entered under the Other Cleanup Activity Action to generically capture the different cleanup phases a site may be undergoing.

1. Comprehensive Site Investigation (SubAction Name = Comprehensive Site Investigation)
2. Remedy Selection (SubAction Name = Remedy Selection);
3. Design (SubAction Name = Design);
4. Construction (SubAction Name = Construction);
5. Post-Construction Maintenance (SubAction Name = Post Construction Maintenance); and
6. Short Term Cleanup (SubAction Name = Short Term Cleanup).

SubAction start and completion dates and SubAction lead codes are available for documenting the start and completion of the different cleanup phases being conducted at non-NPL sites by non-EPA parties.

The following action qualifiers are available for these SubActions:

(H) - High - Higher priority; and

(L) - Low - Lower priority; and

(Blank) - No qualifier specified.

Regions are responsible for maintaining the accuracy of the non-NPL status for every non-NPL site in the CERCLIS inventory. As new actions and new dates are entered into WasteLAN, the system automatically calculates a new value for this field based on the traditional sequence of site assessment work. Regions must confirm or change this value as appropriate.

A.B. SUBJECT MATTER EXPERTS

The following table identifies the subject matter experts for Appendix A: Site Assessment and NPL Listing Decisions.

EXHIBIT A.2 SUBJECT MATTER EXPERTS

Subject Matter Expert	Subject Area	Phone #
Terry Jeng	Site Assessment/NPL Listing	(703) 603-8852
Jennifer Griesert	Site Assessment	(703) 603-8888
Randy Hippen	Site Assessment	(703) 603-8829
Angelo Carasea	Site Assessment/SCAP-13	(703) 603-8828

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